

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE  
PLACEMENT CONSUMER PRIVACY  
LITIGATION

C.A. 12-MD-2358 (SLR)

This Document Relates to:  
**All Actions**

**REPLY DECLARATION OF LISA M. COYLE**

I, Lisa M. Coyle, submit this declaration in further support of the motion to dismiss, for failure to state a claim, the claims asserted against defendants Media Innovation Group, LLP and WPP plc (together, the "Moving Defendants") in the consolidated class action complaint, and hereby state as follows:

1. I am an attorney admitted to practice in the State of New York and admitted to this Court *pro hac vice* in the above captioned action.
2. I am an associate at Ropes & Gray, LLP, counsel to the Moving Defendants.
3. Attached to this declaration as Exhibit B is a true and correct printed copy of the Apple Inc. webpage "Safari Features, Security and Privacy," accessible at <http://www.apple.com/safari/features.html#security>.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 19<sup>th</sup> day of June, 2013.



Lisa M. Coyle

**CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on June 19, 2013, upon the following in the manner indicated:

Charles Slanina, Esquire  
David L. Finger, Esquire  
FINGER & SLANINA, LLC  
One Commerce Center  
1201 North Orange Street, 7<sup>th</sup> Floor  
*Steering Committee Member and Liaison  
Counsel for Plaintiffs*

*VIA ELECTRONIC MAIL*

Stephen G. Grygiel, Esquire  
KEEFE BARTELS  
170 Monmouth Street  
Red Bank, NJ 07701  
*Interim Lead Counsel for the Putative Plaintiff  
Class*

*VIA ELECTRONIC MAIL*

Brian Russell Strange, Esquire  
STRANGE & CARPENTER  
12100 Wilshire Boulevard, Suite 1900  
Los Angeles, CA 90025  
*Interim Lead Counsel for the Putative Plaintiff  
Class*

*VIA ELECTRONIC MAIL*

James Frickleton, Esquire  
BARTIMUS, FRICKLETON, ROBERTSON  
& GORNY-LEAWOOD  
11150 Overbrook Road, Suite 200  
Leawood, KS 66211  
*Interim Lead Counsel for the Putative Plaintiff  
Class*

*VIA ELECTRONIC MAIL*

Barry Eichen, Esquire  
EICHEN, CRUTCHLOW, ZASLOW & MCELROY LLP  
40 Ethel Road  
Edison, NJ 08817  
*Plaintiffs' Steering Committee Member*

VIA ELECTRONIC MAIL

William H. Murphy, Jr., Esquire  
MURPHY P.A.  
One South Street, Suite 2300  
Baltimore, MD 21202  
*Plaintiffs' Steering Committee Member*

VIA ELECTRONIC MAIL

Mark Bryant, Esquire  
BRYANT LAW CENTER, PSA  
601 Washington Street  
P.O. Box 1876  
Paducah, KY 42002-1876  
*Counsel for Plaintiff William G. Gourley and  
Plaintiffs' Steering Committee Member*

VIA ELECTRONIC MAIL

Jonathan Shub, Esquire  
SEEGER WEISS LLP  
1515 Market Street, Suite 1380  
Philadelphia, PA 19102  
*Counsel for Plaintiff Lynne Krause and  
Plaintiffs' Steering Committee Member*

VIA ELECTRONIC MAIL

Jay Barnes, Esquire  
BARNES & ASSOCIATES  
219 East Dunklin Street  
Jefferson City, MO 65101  
*Plaintiffs' Steering Committee Member*

VIA ELECTRONIC MAIL

Seth D. Rigrodsky, Esquire  
Brian D. Long, Esquire  
Gina M. Serra, Esquire  
RIGRODSKY & LONG, P.A.  
2 Righter Parkway, Suite 120  
Wilmington, DE 19801  
*Council for Proposed Intervening Plaintiffs  
Daniel Mazzone, Michelle Kuswanto, Michael  
Frohberg and Andy Wu*

VIA ELECTRONIC MAIL

Kim E. Richman, Esquire  
Michael R. Reese, Esquire  
George Granade, Esquire  
REESE RICHMAN LLP  
875 Avenue of the Americas, 18<sup>th</sup> Floor  
New York, NY 10001  
*Council for Proposed Intervening Plaintiffs*  
*Daniel Mazzone, Michelle Kuswanto, Michael*  
*Frohberg and Andy Wu*

VIA ELECTRONIC MAIL

Sanford P. Dumain, Esquire  
Adam Bobkin, Esquire  
Melissa Clark, Esquire  
Leigh Smith, Esquire  
MILBERG LLP  
One Penn Plaza  
New York, NY 10119  
*Council for Proposed Intervening Plaintiffs*  
*Daniel Mazzone, Michelle Kuswanto, Michael*  
*Frohberg and Andy Wu*

VIA ELECTRONIC MAIL

David Azar, Esquire  
MILBERG LLP  
300 South Grand Avenue, Suite 3900  
Los Angeles, CA 90071  
*Council for Proposed Intervening Plaintiffs*  
*Daniel Mazzone, Michelle Kuswanto, Michael*  
*Frohberg and Andy Wu*

VIA ELECTRONIC MAIL

Kelly E. Farnan, Esquire  
Rudolf Koch, Esquire  
Travis S. Hunter, Esquire  
RICHARDS, LAYTON & FINGER P.A.  
920 North King Street  
Wilmington, Delaware 19801  
*Attorneys for Defendant Vibrant Media Inc.*

VIA ELECTRONIC MAIL

Edward P. Boyle, Esquire  
David N. Cinotti, Esquire  
Joeann E. Walker, Esquire  
VENABLE LLP  
1270 Avenue of the Americas, 24<sup>th</sup> Floor  
New York, NY 10020  
*Attorneys for Defendant Vibrant Media Inc.*

VIA ELECTRONIC MAIL

Anthony J. Weibell, Esquire  
WILSON SONSINI GOODRICH & ROSATI  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
*Attorneys for Defendant Google Inc.*

*VIA ELECTRONIC MAIL*

Carol Lynn Thompson, Esquire  
SIDLEY AUSTIN LLP  
555 California Street, 20<sup>th</sup> Floor  
San Francisco, CA 94104  
*Attorneys for Defendant Pointroll Inc.*

*VIA ELECTRONIC MAIL*

*/s/ Rodger D. Smith II*

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Rodger D. Smith II (#3778)